SUBMISSION OF THE PROVINCE OF ALBERTA

WITH RESPECT TO THE

FINAL REPORT - INQUIRY ON FEDERAL WATER POLICY

June 1986

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1.0 INTRODUCTION

This is Alberta's response to the invitation by the Honourable Tom McMillan, Minister of the Environment for Canada to respond to the Final Report of the Inquiry On Federal Water Policy, dated September 1985. Alberta recognizes that Environment Canada has undertaken a task of large dimensions with considerable potential impact on its own affairs.

Although the recommendations of the Final Report of the Inquiry on Federal Water Policy are aimed solely at the Federal government, the Inquiry recognized that in Canada many environmental issues are not easily divided between the jurisdictions. Alberta appreciates the opportunity to comment on the Inquiry recommendations, and following an extensive review, the Province supports most of the recommendations, questions a few and disagrees with four.

Excellence in water planning and management is a high priority for Alberta, and considerable technical, financial and management resources are directed to the area with a view to attaining the most effective use of water amongst widely diverse current and future needs. Clearly, the mutual goal of Alberta and the federal government is the wisest possible use of a very precious resource.

This reply addresses the recommendations of the Pearse Inquiry in two groups; namely <u>major</u> and <u>minor</u> issues.

2.0 ANALYSIS - MAJOR ISSUES

2.1 Inquiry Recommendation 7.1 - The Fisheries Act

The Fisheries Act (Section 31) and Regulations should be amended to enable the habitat requirements of fish to be considered within the framework of integrated resource management of water systems. These changes should include the following:

i) provisions to enable officials of Fisheries and Oceans Canada to formally engage in integrated resource planning and management with provincial, territorial and other federal agencies.

ii) powers to delegate administrative responsibility for these matters to provincial and territorial agencies in appropriate circumstances.

iii) arrangements to enable project proponents as well as the Minister of Fisheries and Oceans to call for approval of planned projects, and procedures for applying for approvals and reviewing plans.

iv) authority for Fisheries and Oceans Canada to approve plans and formally authorize activities carried out according to the approved plans.

v) where other avenues are not provided, provisions for the Minister of Fisheries and Oceans to hold public hearings at his discretion on development proposals that will affect fish habitat.

Alberta concurs with the Inquiry Report's analysis of the Fisheries Act where it recognizes that it is an inflexible piece of legislation, that it presumes Fisheries and Oceans Canada to be pre-eminent in water resources management, and that any economic activity within a river basin is constantly in technical violation of the Fisheries Act regardless of the level of disturbance. It also leaves open the potential for double jeopardy.

Alberta's understanding of sub-recommendation 7.1 (i) is that Fisheries and Oceans Canada would no longer have a pre-eminent veto position, but would instead be regarded as one of a number of agencies whose responsibilities will have "to be considered within a more comprehensive framework of resource uses and values" (page 68). In Alberta, the authority and responsibility for water resource planning and management rests with Alberta Environment. Fisheries concerns, are currently being addressed within the river basin planning and management process in place within the province.

Alberta strongly supports the concept in sub-recommendation 7.1 (ii) and that part of the supporting text which goes further, and particularly notes the prairie provinces as a region where the responsibility for fish habitat protection should be delegated "to other levels of government", specifically the provincial governments. Current discussions between the federal government and Alberta relating to delegation of authority and responsibility should be accelerated.

If the authority for fish habitat protection is to be delegated to the prairie provinces, then it is Alberta's view that sub-recommendations 7.1 (iii), (iv) and (v) would not apply. All approvals would be obtained in advance from the province as is the current procedure. All public hearings, negotiations, etc. would be conducted by the provinces. The current levels of irritation, uncertainty and extra expense would be reduced if federal and provincial duplication in these areas was eliminated.

2.2 Inquiry Recommendation 7.4 - Navigable Waters Protection Act

The Minister of Transport and the Minister of Justice should accelerate the review of the Navigable Waters Protection Act. Among other things, this review should aim at clarifying the definition of "navigable water" for the purposes of this legislation.

Alberta agrees that the current definition of "navigable water" is va[illegible] and was not intended to apply to all waters in Canada. The following are t[illegible] alternatives that should be considered: (1) defining "navigable water" as waters that are used for commercial navigation on a regular basis; or (2) defining "navigable water" in Alberta as the Peace River from Peace River town to Fort Vermillion, the Athabasca River from Fort McMurray to Fort Chipewyan, etc. Major lakes could also be considered such as Cold Lake, Lake Athabasca and Lesser Slave Lake.

These alternatives should be discussed with the provinces as soon as possible. The current definition results in uncertainty to project proponents on small streams or lakes as to the need to meet this federal act.

2.3 Inquiry Recommendation 7.5 - Prairie Farm Rehabilitation Administration

> The provisions in the Prairie Farm Rehabilitation Act that relate to water development should be reviewed in light of modern conditions and needs. This review should consider, among other things:
>
> i) The appropriateness of this legislation as a means of providing for agricultural water development projects.
>
> ii) The desirability of the limited geographic application of the Act.
>
> iii) The need for regulations to provide guidance about the interpretation and application of the legislation.
>
> iv) The appropriate scope of activities provided for under the Act.

Alberta disagrees with this recommendation. It is Alberta's position that it continues to be appropriate to have a federal agency in existence whose sole mandate is to assist the prairie provinces with water development and soil conservation issues. This region represents a large geographic area of Canada with unique soil and water supply problems relating to the naturally occurring circumstances of drought, soil erosion and limited surface and subsurface water supply. PFRA, unencumbered by legislated regulations, has been an excellent example of federal flexibility and sensitivity and should be left intact.

2.4 Inquiry Recommendation 7.6 - The Canada Water Act

> Part 2 of the Canada Water Act should be repealed and replaced with provisions to authorize the federal government to assist in resolving disputes between provinces and territories about the use of interjurisdictional waters. These new provisions should authorize federal intervention where:
>
> i) The provincial or territorial governments have made reasonable efforts to reach agreement and have failed, and
>
> ii) The federal government receives a complaint from one or more affected jurisdictions.
>
> The legislation should provide that, where these conditions are met, the federal resolution of the problem should be based on the recommendations of a board established for this purpose and on which the affected jurisdictions are represented.

Alberta conditionally supports the intent of this recommendation, provided that it is viewed as an addition to the process of interjurisdictional water management as exemplified by the Master Apportionment Agreement (M.A.A.) and the Prairie Provinces Water Board (P.P.W.B.).

A number of transboundary interjurisdictional water resource problems and issues in the Saskatchewan-Nelson Basin of the prairie provinces have been successfully dealt with under the M.A.A. through the P.P.W.B. Although the Saskatchewan-Nelson Basin is a particularly complex interjurisdictional river basin to manage, the extensive spirit of cooperation of the four parties involved has led repeatedly to the early resolution of problems.

It is Alberta's opinion that this arrangement of a multi-lateral agreement with an administration board could serve as a model for assisting with the management of interjurisdictional river basins in other regions of Canada. The arbitration process proposed by the inquiry team could be a useful addition to the existing dispute resolution process, but it should not be considered as a replacement to the process of ongoing consultation typical of the affairs of the P.P.W.B.

Alberta feels that, although it may be prudent to provide for a precursor step to the courts, it is equally important to first establish formal transboundary water agreements similar to the M.A.A. among the provinces and the federal government in river basins where necessary. Secondly, a dispute resolution mechanism such as the proposed arbitration board could be adopted, but provision must also be made for the use of the Federal Court as the final authority in an unresolvable dispute. Thirdly, the clearest guarantee for a minimum of disputes is an administration board such as the P.P.W.B. that meets on an ongoing basis. Finally, Alberta concurs that Part 2 of the Canada Water Act should be repealed.

2.5 Inquiry Recommendation 10.5 - Municipal Assistance Programs

> The federal government should consult with provincial governments and their municipal water utilities to determine the most appropriate means of improving and financing construction and improvement of municipal water, wastewater and stormwater infrastructure.

Alberta supports this recommendation, however, if such assistance programs as the Community Services Program continue, it is Alberta's position that these federal funds should be routed through the provincial governments.

Further with regards to operator training, the federal government has played a role in developing educational materials. It is Alberta's view that the federal government should continue to coordinate provincial input with the result that high quality training material will be produced which would be acceptable to both levels of government.

Finally, there is a need for a control mechanism for products used in water and wastewater treatment. It is assumed that this would be done at the federal level.

2.6 Inquiry Recommendation 10.9 - Water Quality Standards

> Administration of the deleterious substances section (Sec. 33(2)) of the Fisheries Act should be based not only on national baseline standards for industrial effluents, but also, and more importantly, on site-specific controls consistent with the integrated resource management requirements of particular watersheds.

In Federal waters, this recommendation is entirely a federal matter. However, Alberta disagrees with this recommendation and in fact has continually voiced strong opposition to the principles contained in Section 33

as evidenced by Alberta's submission on Bill C-38 "An Act to Amend the Fisheries Act" to the House of Commons Standing Committee on Fisheries and Forestry and so recorded in Minutes and Proceeding Issue No. 33 dated June 16, 1977. This piece of legislation remains an intrusion into provincial jurisdiction and repudiates any acknowledgment of provincial control and water resources management programs moreover, environmental jurisdiction. The provision of Section 33 (2) of the Fisheries Act duplicates the water quality management initiatives of Alberta through the provincial Clean Water Act. Alberta's view is that this section should be removed from the Fisheries Act leaving the task of setting water quality standards at the watershed level to the provincial governments, subject of course to Alberta's position to uphold agreed-upon national standards and guidelines.

2.7 Inquiry Recommendation 10.11 - Drinking Water Standards

The federal government should take the initiative in establishing minimum quality standards for drinking water throughout Canada by:

i) seeking the cooperation of the provinces in revising and expanding the existing national drinking water guidelines as a matter of urgency;

ii) inviting the provinces to participate in designing a model safe drinking water act suitable for adaptation and adoption by each jurisdiction;

iii) passing a safe drinking water act to apply to waters under federal jurisdiction.

Alberta has consistently adopted through appropriate standards or regulations all agreed-upon national water quality guidelines. Alberta is actively participating in the current review and updating of the Canadian

Drinking Water Guidelines. The need for a safe drinking water act will have to be carefully examined within the context of the financial capability of provincial and municipal jurisdictions to provide the level of treatment necessitated if unrealistically high standards are established at the federal level.

2.8 Inquiry Recommendation 10.14 - Atmospheric Emissions

> The federal government should vigorously pursue efforts to control acid rain by:
>
> i) pressing forward its arrangements with provinces to achieve the targeted reduction in acid-causing emissions by Canadian industry;
>
> ii) using all its available influence to induce the government of the United States to substantially reduce airborne pollutants that are transported into Canada;
>
> iii) support multinational research on global atmospheric pollution and efforts to establish international cooperation in controlling it.

Alberta understands this recommendation to be directed to the provinces when deposition rates exceed agreed-upon target loadings. Within this context, Alberta supports the intent of the recommendation. Alberta, in conjunction with the other western provinces is currently funding research to establish target loadings for Western Canada. Based upon available information, deposition rates in Alberta are consistently below the interim target loadings.

This province will continue its involvement in the Long Range Transport of Air Pollution Program, and agrees on the need to address this issue on a regional, national, continental and global basis.

3.0 ANALYSIS - MINOR ISSUES

3.1 Inquiry Recommendations 7.2 and 7.3 - Industrial Programs & Toxic Wastes

> The Environmental Contaminants Act should be amended substantially to place the onus on producers, importers and users of toxic substances that fall within certain categories (to be listd in regulations) to seek approval and registration of those substances before they are marketed or used.
>
> The controls on cleaning agents and water conditioners that contain harmful nutrients, now in Part 3 of the Canada Water Act, should be integrated into the Environmental Contaminants Act.

Alberta concurs with these recommendations.

3.2 Inquiry Recommendation 10.1 - Integrated Watershed Management

> The federal government should adopt integrated watershed management as a principle of federal water policy.

This recommendation is clearly suitable for waters under federal jurisdiction. Alberta concurs with this approach and for some years has practiced it in its river basin planning and management process. Examples include the South Saskatchewan and Cold Lake-Beaver River studies completed in 1984 and 1985 respectively.

3.3 Inquiry Recommendation 10.2 - Water Conservation

> The federal government should encourage water conservation and demand management practices by explicitly endorsing the principle that beneficiaries should pay for water and wastewater services by means of appropriate prices.

Alberta supports the intent of this recommendation as it relates to water conservation. However, water management tools and strategies like demand management and pricing are the responsibility of the Provincial governments.

3.4 Inquiry Recommendation 10.4 - Inter-Basin Transfer

> Projects involving transfers of water from one basin to another should be considered only with great caution and only when alternative means of serving the purpose are infeasible. Federal involvement in such projects should be based on comprehensive evaluation of proposals including careful analysis of economic, social and environmental impacts in both donor and receptor basins.

The Alberta government's policy on water management is that the water resources of the province are managed on a river basin basis. The water in each basin must be fully and efficiently utilized before major interbasin transfer will be considered. Planning and management is being concentrated on developing water plans for each of the six major river basins in the province (Peace, Athabasca, North Saskatchewan, Bow, Red Deer, Oldman). None of these river basins has reached full water allocation at this time. No studies are underway which contemplate transferring water from one basin to another.

3.5 Inquiry Recommendation 10.6 - Pricing Municipal Water & Wastewater Services

> The federal government should have the Economic Council of Canada undertake a thorough study of appropriate pricing for municipal water and wastewater services in Canada. This study should:
>
> i) be undertaken in consultation with provincial governments and water utilities;

ii) take account of experience with water pricing systems in other countries;

iii) estimate the economic benefits of appropriate pricing, taking account of its social impacts and implications for regional development;

iv) make recommendations for implementing suitable pricing systems in Canada including the practicability of universal metering.

Establishment of a committee to review water and sewage treatment pricing practices is a good concept. This committee should consist of a combination of a set of experts from each province and the Economic Council of Canada.

It is Alberta's view that the collective experience of the provinces should be used in evaluating and recommending water pricing systems in Canada.

3.6 Inquiry Recommendation 10.7 - Drainage and Irrigation

The federal government should participate in irrigation and drainage programs only under cost-sharing agreements that are available to all provinces on a consistent basis. To qualify for federal support, projects should:

i) be in the form of off-farm, collective or community works;

ii) be subjected to comprehensive evaluation to determine all their effects in the watershed and to demonstrate that their benefits exceed costs according to benefit- cost analyses appropriate for water-related projects;

iii) provide for charges to the direct beneficiaries that reflect the cost of providing them with the benefits they receive.

Alberta queries the wisdom of this recommendation because it insufficiently recognizes the varying physical, social and economic circumstances between regions. Agricultural development through irrigation

and drainage projects can be of particular significance to the welfare of a region and its people.

The Inquiry report gives little recognition to the higher investment and production costs associated with irrigation. Further, it underestimates the need to provide some increased opportunity for financial gain as an incentive for producers to make associated on-farm investment when suggesting irrigation water charges should equal the enhanced value of crops produced.

Irrigation development has been particularly effective in stimulating ongoing economic benefits and forms an important element in Alberta's objective of economic diversification.

3.7 Inquiry Recommendation 10.8 - Flood Damage Reduction

Federal activities related to floods should be confined to:

i) compiling hydrological data about flooding and flood risk;

ii) constructing flood control works where federal interests are threatened or where damages are likely to be of national significance;

iii) providing emergency and disaster relief.

Alberta supports this recommendation and is currently assessing the merits of entering into a Flood Damage Reduction Agreement with the federal government.

3.8 Inquiry Recommendation 10.10 - Industrial Programs

The federal government, in consultation with provincial governments and industrial representatives should accelerate efforts to reduce industrial pollution by:

i) reviewing and upgrading schedules for compliance with industrial effluent regulations;

ii) extending the accelerated capital cost allowance for pollution control equipment to water conserving equipment;

iii) investigating other means of providing incentives and assistance for improving the control of industrial effluents;

iv) encouraging the development of corporate water conservation plans and quality control audits by providing information and other assistance.

Alberta has repeatedly guaranteed that it will uphold national water quality standards through the full use of the Alberta Clean Water Act. Alberta will move to accelerate the reduction of industrial pollution along national guidelines, but through the use of the Clean Water Act, not section 33(2) of the Fisheries Act.

3.9 Inquiry Recommendation 10.12 - Water Quality Guidelines

The federal government should increase its efforts to reach agreement with the provinces on water quality guidelines for major water uses.

The Canadian Water Quality Guidelines Task Force of CCREM, chaired by Alberta, is currently working in this area. A report is now being prepared for release.

3.10 Inquiry Recommendation 10.13 - Toxic and Persistant Contaminants

To develop more effective controls over toxic substances and hazardous wastes; the federal government should:

i) designate the Minister of the Environment as the federal coordinator for toxics control;

ii) seek stronger intergovernmental coordination of control programs through the Canadian Council of Resource and Environment Ministers;

iii) promote a "cradle-to-grave" approach in controlling toxic substances;

iv) support investigations of new control policies through expert consultations convened by the Minister of the Environment.

Alberta agrees that CCREM should be the appropriate vehicle for intergovernmental coordination on the management of toxic substances and hazardous wastes.

3.11 Inquiry Recommendation 11.1 - Canadian Water Research Council

The Minister of the Environment should be empowered to appoint a Canadian Water Resources Research Council with terms of reference that direct it to:

i) provide up-to-date assessments of the current and emerging needs of water-related research in Canada;

ii) assess the adequacy of financial and other support for water- related research;

iii) offer advice on research priorities and the appropriate distribution of federal research support to federal research centres, universities, provinces and the private sector;

iv) investigate other policy questions related to water research that it considers appropriate or that the Minister may refer to it;

v) report annually to the Minister and issue reports on special subjects as appropriate.

Alberta agrees that the proposed Council membership should represent users, researchers and managers in the federal and provincial governments, the universities and the private sector. There is already an initiative

through CCREM to facilitate the intergovernmental coordination of environmental research and it is Alberta's view that it should be the prime initiative.

The recommendation is welcomed providing that the proposed Canadian Water Resources Research Council will embrace the objectives of the Associate Committee on Hydrology of the National Research Council. It must, however, have the authority to grant funds for priority research subjects and projects if it is to have a meaningful role. Merely offering advice and recommendations is not sufficient. Some research priorities must go beyond pure research through addressing subjects and projects that will enhance the standing of Canadian practitioners in the water field (i.e. support for technologies that can be exported).

3.12 Inquiry Recommendation 11.3 - Federal Research Institutes

> The Treasury Board should revise its policies relating to the commercial use of governmental laboratories and equipment to facilitate their use by outside researchers.

Alberta would be supportive of federal funds being directed to this area since it supports the development of meaningful national standards.

3.13 Inquiry Recommendation 11.6 - Water Resources Data Collection

> The federal government should maintain a continuing commitment to the Water Survey of Canada and hasten negotiations with provinces and territories to extend the water quality monitoring program nationally.

Alberta continues to support the Water Survey of Canada and is actively negotiating a federal-provincial water quality monitoring cost-sharing agreement.

3.14 Inquiry Recommendation 11.7 - Groundwater Data Collection

> The federal government should seek the cooperation of the provincial governments to extend the water data collection systems to include Canadian groundwater resources.

Alberta has a well established network of stations and also obtains records from water well drillers operating across the province. Alberta would be prepared to cooperate with the federal government to extend and enhance the network where appropriate.

3.15 Inquiry Recommendation 11.9 - Remote Sensing

> Remote sensing and other advanced technologies should be explored with a view to effecting economies and improving water quantity and quality monitoring systems.

Alberta supports this recommendation.

3.16 Inquiry Recommendation 11.10 - Water Directory

> Environment Canada should publish a comprehensive directory of water-related data and sources.

Alberta supports this recommendation.

3.17 Inquiry Recommendation 11.11 - Data User Charges

> Environment Canada should review the data distribution policies of its various services with a view toward implementing consistent cost-recovery charges for data provided on request to clients who are not parties to intergovernmental data agreements.

Since Alberta is a party to two agreements and is negotiating a third with Environment Canada, it is not likely to be faced with cost-recovery charges for data published in standard form. However, it is evident that Environment Canada would like to recover costs for data provided on a real-time basis (i.e. for the cost of transmitting those data).

It would be appropriate to levy charges for data provided to parties outside intergovernmental agreements but these charges should be limited to those for the preparation and distribution of data publications and the actual cost of copying and distributing original records such as streamflow measurements and water level recorder charts. Users should not be required to pay for the actual cost of gathering, compiling and processing these data.

3.18 Inquiry Recommendations 12.1 and 12.2 - Water Export

> The federal government should pass legislation to require anyone who proposes to export water to obtain a licence. This legislation should identify the matters that will be taken into account in considering a licence application.
>
> The Cabinet should determine whether the government is prepared to consider large scale diversions of water to the United States and, if so, the criteria that must be met for approval of proposals.

These recommendations do not apply to Alberta. One of Alberta's Water Resource Management Principles states that "Alberta will not be party to any

undertaking for the possible export of water beyond Canadian borders. The priority of water use and allocation is based firstly on provincial, secondly on interprovincial and finally on national considerations, and will not be influenced by international considerations" (Water Resources Management Principles for Alberta, Alberta Environment).

3.19 Inquiry Recommendations 15.1 and 15.2 - A National Water Conservation Program

Recommendation 15.1

> The federal government should invite the provincial and territorial governments to collaborate in a National Water Conservation Program. This program should be embodied in general water conservation and development agreements between the federal and the provincial and territorial governments. These master agreements should:
>
> i) be designed in consultation with the provinces and territories;
>
> ii) include a general commitment to cooperation in water matters and set out the principles and conditions of cooperation;
>
> iii) provide for supplementary agreements on specific collaborative programs;
>
> iv) specify consultative arrangements to oversee joint undertakings.

It is Alberta's view that existing federal/provincial agreements are sufficient for any future joint undertakings in such areas as water conservation.

Recommendation 15.2

> The federal Minister of the Environment should invite the Canadian Council of Resource and Environment Ministers to assist in designing the National Water Conservation Program.

While Alberta supports the intent of this recommendation it is noted that not all provincial ministers responsible for water management are members of CCREM. It will be necessary to ensure that these ministers are included in this initiative.

3.20 Inquiry Recommendations 15.3 and 15.4 - Intergovernmental Communication and Consultation

Recommendation 15.3

> The federal government and each provincial and territorial government should establish a joint management committee to negotiate and supervise the implementation of their water conservation and development agreements.

If Alberta should choose to enter into either water conservation and/or development agreements, it concurs that a joint management committee would be an appropriate vehicle for directing joint initiatives under such agreements.

Recommendation 15.4

> The federal government should designate an official in each province and territory to coordinate and provide information about federal water policies and programs.

It is Alberta's view that existing arrangements are adequate.

3.21 Inquiry Recommendation 16.2 - National Water Conservation Awareness Program

Environment Canada should initiate and support a national water conservation awareness program, similar in organization and approach to the PARTICIPaction program.

Alberta does not require "the federal government to provide leadership in directing attention and resources to urgent problems and to implement the approaches to water resource management...". Alberta is aware of the need for raising the public's interest in water conservation. However, each province will have specific provincial needs and regional needs, best addressed within the framework of overall provincial policies. Should the federal government wish to take an active role, it can do so by providing financial assistance through redirection of existing program funding. Federal duplication of existing provincial water planning and management activities is unwarranted but particularly so in the current times of fiscal restraint and deficit cutting initiatives.

4.0 CLOSING STATEMENT

The government of Alberta appreciates the opportunity of reviewing and commenting on the Final Report of the Inquiry on Federal Water Policy. The document has proven to be both a timely and comprehensive discussion of water management in Canada.

As mentioned in the preceeding text of this review document, water resources management is a provincial responsibility. The following are a few suggestions that would ensure that this mandate is respected. Firstly, as follow-up to this and other submissions it would be appropriate for all parties (federal, provincial, territorial) to discuss the report's recommendations in detail. Secondly, if there is to be a formal review of the report's recommendations, then Alberta would wish to discuss those report items that relate to provincial water resource responsibilities. Before consideration is given to implementing any of the Pearse recommendations, a review of this nature should be undertaken by the CCREM ministers, preferably at the Fall 1986 meeting. Thirdly, it is Alberta's view that individual provincial agreement must be sought on the implementation of any recommendation which has an impact on provincial water resources ownership and management responsibility.